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Attorneys for Sonos, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA,
SAN FRANCISCO DIVISION

SONOS, INC.,
Plaintiff and Counter-defendant,
v.
GOOGLE LLC,
Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA
Consolidated with Case No. 3:21-cv-07559-WHA

**DECLARATION OF CLEMENT
ROBERTS IN SUPPORT OF SONOS,
INC.'S ADMINISTRATIVE MOTION
TO FILE UNDER SEAL RE SONOS,
INC.'S SUPPLEMENTAL BRIEF
REGARDING '885 AND '966 PATENTS**

I, Clement Roberts, declare as follows and would so testify under oath if called upon to do so:

1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good standing of the Bar of the State of California. I make this declaration based on my personal knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set forth herein.

2. I make this declaration in support of Sonos’s Administrative Motion to File Under Seal in connection with Sonos’s Supplemental Brief Regarding ’885 and ’966 Patents.

3. Sonos seeks an order sealing the materials as listed below:

DOCUMENT	PORTIONS TO BE SEALED	DESIGNATING PARTY
Exhibit 5 to Kolker Declaration	Portions identified with blue highlighting	Sonos

4. The portions of Exhibit 5 to the Kolker Declaration identified with blue highlighting contain references to Sonos’s confidential business information and trade secrets, including source code. This source code is confidential information that Sonos does not share publicly, which reveals technical details of the operation of Sonos’s technology. Thus, public disclosure of such information may lead to competitive harm as Sonos’s competitors could use these details to gain a competitive advantage in the marketplace with respect to their competing products. A less restrictive alternative than sealing the portions of Exhibit 5 to the Kolker Declaration would not be sufficient because the information sought to be sealed is Sonos’s confidential business information and trade secrets and is integral to Sonos’s legal arguments.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 1st day of May, 2023 in Belevedere, California.

/s/ Clement S. Roberts
Clement Seth Roberts